

EXHIBIT 137

Rapid Response Team
January 7, 2011
Existing Client – Jeffrey Epstein (Follow-up Rapid Response Mtg.)

Private Banker – Paul Morris – 212 464-0701
Senior Manager – Mary Casey – 212 464-0374

Nature of Existing Relationship

The Epstein relationship, which includes accounts for his personal investment company – Financial Trust Company, mainly consists of banking and asset accounts with balances totaling approximately \$112.4 million.

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During the period of March 2010 to December 2010, there were eight large cash withdrawals totaling \$240,000 where Currency Transaction Reports were filed.

Source of Wealth

Jeffrey Epstein is a money manager for wealthy individuals. Press articles indicate that he owns what is said to be the Manhattan's largest private house and runs his business from a 100 acre private island in St. Thomas.

Recent Excerpts from press

- **The Palm Beach Post 8/1/10 Epstein may be under new sex crime scrutiny from feds**

Authorities may not be done with billionaire sexual deviant **Jeffrey Epstein** after all.

Epstein, 57, who recently fulfilled all the requirements of his slap-on-the-wrist sentence may be under investigation for other sex crimes, including child trafficking. And this time, Epstein would be facing the federales -- and 20 years in prison!

According to the news website The Daily Beast, the feds are also checking whether a modeling agency run by a friend of the Wall Street investor Epstein fed his appetite for underage foreign girls. Epstein was known to fly young women from Eastern Europe to Palm Beach, where they'd massage him, among other services.

Because of double jeopardy rules, Epstein -- now a registered Florida sex offender -- can never be prosecuted again for crimes covered by the state charges. He pleaded guilty to felony solicitation of prostitution and procuring a person under 18 for prostitution, also a felony. Child trafficking, however, would offer two advantages to federal prosecutors: The charge would not be covered by double jeopardy; and there's no statute of limitations

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Palm Beach Daily News 7/18/10 House arrest nears home stretch for Epstein

Palm Beach billionaire sex offender Jeffrey Epstein will be a free man when his year of probation ends Wednesday for sex crimes he committed against under-aged girls.

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Epstein has settled more than two dozen lawsuits and claims against him by teen-agers who say they were lured to his Palm Beach mansion to give him sexually charged massages and/or sex in exchange for money. The terms of all settlements are confidential.

The man described as a brilliant money manager and mathematician walks away with a lifelong label -- registered sex offender. From the deal he struck with state and federal prosecutors to his liberal probation, the word "unusual" is often used by those familiar with sex offender crimes to describe Epstein's case.

A secret deal with federal prosecutors revealed Epstein could have been charged with multiple federal counts of sexual exploitation of minors, resulting in much harsher penalties. But the feds deferred to two state charges that got him an 18-month sentence. Serving 13 months, segregated in a vacant wing of the county stockade, Epstein was let out on work release six days a week for up to 16 hours a day.

Palm Beach Daily News 9/19/10 Woman sues Epstein for \$50 M, alleging abuse as teen

A new federal lawsuit filed Friday against billionaire sex offender Jeffrey Epstein asks for more than \$50 million in damages for a woman who alleges repeated sexual abuse by Epstein at his El Brillo Way mansion when she was 16. The victim, [REDACTED] alleges she was coerced into prostitution as a minor by Epstein, assisted by his employee [REDACTED]

[REDACTED] alleges Epstein has transferred and is transferring his assets overseas and elsewhere to conceal them from her and to prevent [REDACTED] from obtaining those assets in any judgment she may receive against him.

She is asking Epstein to post a \$15 million bond to satisfy a potential judgment in the case. In addition, she wants an accounting of his "significant financial assets," an injunction against him transferring his assets elsewhere and the appointment of a receiver to take charge of his assets.

Prior Rapid Response information

Derogatory Information originally reported by Security Services (September, 2006)

The following derogatory information was identified by Security Services within related entity DDRs for Jeffrey Epstein:

- Several newspaper articles were found that detail the indictment of Jeffrey Epstein in Florida on felony charges of soliciting underage prostitutes.

Derogatory Information Update – July 2008

On July 3, 2008, Jeffrey Epstein was sentenced to 12 months in jail for solicitation of a prostitute and six months for procuring a person under age 18 for prostitution. His jail sentence will be followed by 12 months of house arrest.

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Conclusion from 1st Rapid Response Meeting of 10/17/06

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After internal discussions with Jes Staley, Mary Erdoes, Catherine Keating, John Duffy and Mary Casey, it was decided that we will keep Mr. Epstein solely as a banking client and on a 'reactive', client service basis. We will not proactively solicit new investment business from him.

Conclusion from follow-up Rapid Response of 7/15/08:

No change to relationship approach.

Conclusion from follow-up Rapid Response of 1/07/11:

Further meetings held with Jes Staley to discuss LOB decision for re-approval. Banker Paul Morris spoke with Mr. Epstein with regard of large cash withdrawals. Mr. Epstein withdraws anywhere from \$20K to \$40K in cash to pay for fuel expenses when he travels to foreign countries. Banker Paul Morris was instructed by the Committee to update the entity KYC which holds the operating account for Mr. Epstein's personal airplane, Hyperion, to document the purpose of the cash withdrawals. Further, Paul Morris informed Mr. Epstein that the SBLC would not be renewed. Mr. Epstein will continue to be a banking only client.

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